UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

LEMOND CYCLING, INC.,

Plaintiff,

v.

TREK BICYCLE CORPORATION,

Defendant and Third-Party Plaintiff,

v.

GREG LEMOND,

Third-Party Defendant.

Case No. 08-CV-1010 (RHK-JSM)

AFFIDAVIT OF ELISABETH HUBER

STATE OF WISCONSIN)
) ss.
COUNTY OF JEFFERSON)

Elisabeth Huber, being first duly sworn under oath, deposes and states as follows:

1. I am an adult resident of the State of Wisconsin and am a Project Manager for the Defendant, Trek Bicycle Corporation. I make this affidavit on personal knowledge.

2. I coordinated Mr. LeMond's bicycle transactions including both the free bikes he received as well as those he purchased at employee pricing. I did so directly with Mr. LeMond, and with people working for him, including Mary Haigh.

3. In preparation for my deposition in this case, I reviewed the deposition transcript of Greg LeMond and some of the exhibits to his deposition. Upon review of

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those documents, I learned that Mr. LeMond had been selling the bicycles he received for profit, bartering them for goods, and using them to advance his other business ventures. I never authorized any such activity.

4. Trek never would have permitted Mr. LeMond to use free or employee discount priced bicycles to sell for profit, for bartering, or to advance his unrelated business ventures.

5. I have reviewed the records of Mr. LeMond's bike purchases and have calculated the amount he paid for the bicycles as well as the retail price for those bicycles. The difference between the retail price and the amount Mr. LeMond paid for the bicycles is $992,606.25.

s/ Elisabeth Huber
Elisabeth Huber

Subscribed and sworn to before me
this 4th day of August, 2009.

s/ Lisa Smith
Notary Public, State of Wisconsin
My Commission expires: 10/17/2010